

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:)	
)	
Request for Review of the Decision of the)	
Universal Service Administrator by)	
)	
BellSouth Telecommunications, Inc.)	CC Docket No. 02-6
Atlanta, Georgia)	

REQUEST FOR REVIEW

This is an appeal of a March 10, 2004 decision by the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (Administrator) in which the SLD denied BellSouth Telecommunications, Inc.'s (BellSouth's) appeal of the SLD's commitment adjustment, issued June 20, 2003, regarding funding year 1999-2000. This appeal is made pursuant to Commission Rules 54.719(c) and 54.722. 47 C.F.R. §§ 54.719(c), 54.722.

BELLSOUTH'S STATEMENT OF INTEREST

The SLD seeks to recover approximately \$96,126 from BellSouth that it disbursed to BellSouth for remittance to Orleans Parish School District (Applicant or Orleans). These funds, the SLD later determined, were disbursed in error. BellSouth acted only as a pass-through facility for the Orleans' fund disbursements, and had no role or responsibility with respect to the error or errors in question made by Orleans. The SLD's decision effectively places BellSouth in the role of collection agent regarding the erroneously disbursed funds, which is inappropriate under the circumstances.

STATEMENT OF MATERIAL FACTS

A. Background

The funding disbursements at issue were made under the auspices of the federal universal service for schools and libraries mechanism (also known as the "e-rate program"). Under that mechanism, eligible schools and libraries receive discounts for eligible telecommunications services, Internet access and internal connections. *See In the Matter of Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, *Third Report and Order and Second Further Notice of Proposed Rulemaking*, ___ FCC Rcd ___, ¶¶ 4-8. (December 23, 2003).

Under the e-rate program, applicants may apply for discounted services after completing technology assessments and developing plans to ensure that services purchased will be used

effectively. Applicants then must submit FCC Form 470 to the Administrator, in which they describe their technological needs and the services for which they are requesting discounts. After complying with the FCC's competitive bidding requirements and entering into contracts with eligible service providers, schools and libraries then must file Form 471 applications notifying the Administrator of the ordered services, the service providers under contract for those services, and an estimate of the funds needed to cover the discounts to be given for eligible services. *Id.*

The Administrator reviews the Form 471s and makes funding commitment decisions indicating the discounts that applicants may receive pursuant to Commission Rules. Applicants then have a choice of either: (1) paying the bills in full and seeking reimbursement for funds from the Administrator via the service or equipment provider; or (2) paying the non-discount portion of the service cost to the service provider who, in turn, seeks reimbursement from the Administrator for the discounted amount. *Id.* ¶ 5. Discounts determined by the Administrator range between 20 and 90 percent (*i.e.*, applicants pay between 80 and 10 percent for eligible services and equipment), and are principally based on applicant need indicators. *Id.*

Applicants choosing the first payment/reimbursement option obtain the discounted amounts by submitting Form 472s to the Administrator. *See* Schools and Libraries Universal Service, Billed Entity Applicant Reimbursement ["BEAR"] Form, OMB 3060-0856, FCC Form 472. Exhibit A. Applicants self-certify on the BEARs that they are entitled to reimbursement of discounts on the approved services indicated, with respect to which they have already paid the service providers. *Id.* p. 3. On the last page of the BEARs, service providers must acknowledge their obligation to remit discount amounts received from the Administrator to the Applicants within specified time frames and prior to tendering the payments that have been issued to them. *Id.* p. 4. Service providers make no other certifications or acknowledgements on the BEARs.

B. The SLD's Commitment Adjustment Letter.

On June 20, 2003, the SLD notified BellSouth that funds disbursed for funding year 1999-2000 relating to the Orleans funding commitment were "disbursed in error." Letter from SLD to F. Reed, June 20, 2003 w/attachments ("COMAD¹ Letter"). Exhibit B. The COMAD Letter referred to 89 specific funding requests made by Orleans in the 1999-2000 Funding Year under its Form 471 (Application Number 139084). *Id.*

Each of the funding requests, the SLD asserted, was determined to be in error after an SLD audit. The SLD explained that, in each case, the "applicant had successfully invoiced the SLD in excess of the actual charges incurred for th[e] funding request." *Id.* The excess amounts disbursed ranged between several hundred and two thousand dollars. *See id.* In each explanatory narrative, the SLD claimed that it was "unable to disburse funds for services that were not delivered . . . [and, thus] must seek recovery", *i.e.*, from BellSouth. *Id.* The total amount sought by SLD was \$96,125.81, *i.e.*, the difference between the proper funding commitment amounts and the funds actually disbursed.

¹ "COMAD" stands for Commitment Adjustment.

C. BellSouth's Appeal.

BellSouth timely appealed the SLD's COMAD Letter to USAC on August 19, 2003. Letter from L. Foshee to SLD, USAC, August 19, 2003. Exhibit C. USAC denied BellSouth's appeal in full by letter dated March 10, 2004. Letter from USAC to L. Foshee, March 10, 2004. Exhibit D. This Request for Review timely appeals the USAC's March 10, 2004 decision.

QUESTION PRESENTED FOR REVIEW

The issue presented in this appeal is whether it is appropriate, under the facts of this case, for the SLD to seek recovery of the excess funds it disbursed to Orleans (through BellSouth), from Orleans -- the party fully responsible for the errors -- or BellSouth, which had no knowledge of the errors or the excess disbursements caused by the errors.

ARGUMENT

The Funds Should Be Recovered From The Party In Error -- Orleans -- Not BellSouth.

A. The SLD's recovery plan should not apply in this case.

Citing Commission "rules" governing the recovery of erroneously disbursed program funds, the SLD stated that it was "required to seek repayment of funds from service providers [rather than schools and libraries] when [it] determines that funds have been disbursed in error." USAC Order at 2 (citing *In re Changes to the Board of Directors of the National Exchange Carrier Association, Inc., Federal-State Joint Board on Universal Service*, CC Docket Nos. 97-21, 96-45, FCC 99-291 ¶¶ 8, 9 (October 8, 1999)).

The order cited by SLD, known as the *Commitment Adjustment Order*, required the SLD to pursue repayments from SPs for erroneously disbursed funds. The historical record makes clear, however, that when the FCC adopted the SLD's recovery plan in 1999-2000, it intended to cover situations in which funds were disbursed in violation of *statutory* requirements; *e.g.*, when discounts were sought for ineligible services, or the services were provided by non-telecommunications carriers. Even so, the Commission has always made clear that it did not intend for the plan "to cover the rare cases in which the Commission has determined that a school or library has engaged in waste, fraud or abuse." Such situations, the Commission noted, should be addressed on a case-by-case basis. *Commitment Adjustment Order, supra*, at ¶¶ 7-10. *See also Third Report and Order and Second Further Notice of Proposed Rulemaking, supra*, at ¶¶ 78-80.

More recently, in the *Third Report and Order and Second Further Notice of Proposed Rulemaking, supra*, the Commission further clarified its decisions in the *Commitment Adjustment Order* and *Commitment Adjustment Implementation Order*² as follows:

² *Changes to the Board of Directors of the National Exchange Carrier Association, Inc., Federal-State Joint Board on Universal Service*, CC Docket Nos. 97-21, 96-45, Order, 15 FCC Rcd 22975 (2000).

While the Commitment Adjustment Implementation Order implemented procedures, consistent with the Commission's debt collection rules, for recovery of funds that were disbursed in violation of statutory requirements, the *Commission has not comprehensively addressed the question of what recovery procedures would be appropriate in situations where it is determined that the funds have been disbursed in violation of particular programmatic rules that do not implicate statutory requirements.* Likewise, the Commission has not addressed the question of what procedures are needed to govern the recovery of funds that have been committed or disbursed in situations later determined to involve waste, fraud or abuse.

Third Report and Order and Second Further Notice of Proposed Rulemaking, supra, at ¶ 79 (emphasis added). Accordingly, the Commission has sought public comment in support of its consideration of "whether [the Commission] should implement procedures or adopt rules for funds that are disbursed in violation of one or more programmatic rules or procedures under the schools and libraries program or in situations involving waste, fraud or abuse." *Id.* at ¶ 81.³

Thus, contrary to the SLD's approach in this matter, the Commission itself has made clear that one stock answer does not apply to every erroneous fund disbursement question. Rather, the FCC affirmed the SLD's recovery plan for a certain defined set of circumstances involving statutory violations, not the kind (or kinds) of error (or errors) involved in this case. Whatever the source or cause of the "errors" made by Orleans on the BEARs (with respect to which BellSouth cannot surmise), there is no indication of a statutory violation of the kind referred to in the Commission's rulings. Certainly, BellSouth has not engaged in any conduct itself that would justify compelling recovery from it as opposed to the party in error -- Orleans.

This case, thus, presents precisely the kind of situation to which the Commission has, at best, not addressed itself *vis a' vis* the SLD's recovery plan or, at worst, has so addressed itself and decided that "case-by-case" consideration was appropriate.

B. Orleans, not BellSouth, prepared, self-certified and submitted the erroneous requests and is solely responsible for any recovery.

The error or errors that caused the excess funds to be disbursed were committed entirely by Orleans. BellSouth had no conceivable role in the commission of those errors. The SLD's demands, thus, effectively treat BellSouth as a collections agent for a debt owed not by BellSouth, but by Orleans. This is not a role that BellSouth has sought to assume, and it is neither proper nor fair.

Pursuant to SLD procedures, the Applicant bears sole responsibility to verify the accuracy of the numbers contained on the Form 472s. The service provider, on the other hand, is only obligated to certify that it will remit the discount amounts authorized to the Applicant as soon as possible and prior to tendering the payment issued to the service provider. In this case, Orleans Parish, not BellSouth, had sole responsibility for filling out the Form 472s with the correct amount due based on what it had actually paid for the services, not based on what it was

³ BellSouth has provided comments in these proceedings. Exhibit E.

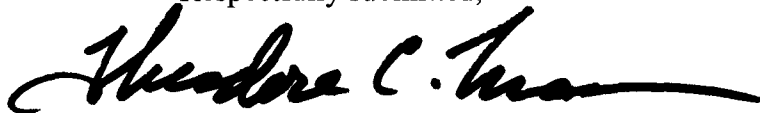
originally committed. Orleans Parish, for whatever reason or reasons, failed to meet its obligations here.

The SLD's practice of automatically seeking reimbursement from the service provider unacceptably relieves the Applicant of responsibility and incentive to get the numbers right in the Form 472s. If the party responsible for verifying the amounts claimed in the BEAR form is not the party to be held responsible if those amounts are inaccurate, there is no incentive for the Applicant to do any due diligence to verify its filings. The prospect that a school or library might be hauled into local court by a service provider seeking restitution of moneys had (and surely spent) is not a sufficient counterweight under the circumstances and, in any event, is a poor policy substitute for properly motivating the Applicants to prepare forms carefully and accurately.⁴

STATEMENT OF RELIEF SOUGHT

In consideration of the foregoing, BellSouth respectfully requests that the Commission reverse the decision of the SLD and rule that the SLD should not seek recovery of the erroneously disbursed funds from BellSouth or, alternatively, that the Commission remand the matter to the SLD with instructions that it conduct further proceedings consistent with its opinion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Theodore C. Marcus", with a long horizontal flourish extending to the right.

Lisa S. Foshee
Theodore C. Marcus
BellSouth Telecommunications, Inc.
675 West Peachtree Street
Suite 4300
Atlanta, Georgia 30375
Ph (404) 335-0754
Fax (404) 614-4054

⁴ BellSouth's likelihood of recovery from Orleans Parish at this stage is next to nil. The contract associated with the services that are the subject of this recovery has long since expired.

CC Docket No. 02-6

Exhibit A

Universal Service for Schools and Libraries

Please read instructions before completing.

Estimated Average Burden Hours Per Response: 1.5 hours
(To be completed by schools, libraries, or consortia.)**BILLED ENTITY APPLICANT REIMBURSEMENT FORM****For reimbursement of discounts on approved services already paid for by the Billed Entity Applicant.****Only one Service Provider Identification Number (SPIN) per form.****Must be completed and signed by the Billed Entity Applicant and signed by the relevant service provider.**

Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

NOTICE TO INDIVIDUALS: Section 69.619 of the Federal Communications Commission's rules requires the fund administrator to review bills for services and to determine the amount of universal service support to be disbursed to service providers. All schools and libraries and consortia of these entities who have received a Funding Commitment Decisions Letter from the fund administrator and that have paid for in full the price of eligible services which are approved for discounts, and that seek reimbursement of the discounts, must file this Billed Entity Applicant Reimbursement Form. This Billed Entity Applicant Reimbursement Form informs the fund administrator of the amount of the discounts which the applicant has already paid and for which the applicant seeks reimbursement from its service provider. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The FCC is authorized under the Communications Act of 1934, as amended, to collect the personal information we request in this form. We will use the information you provide to determine whether approving this form is in the public interest. If we believe there may be a violation or potential violation of a FCC statute, regulation, rule or order, your form may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing or implementing the statute, rule, regulation or order. In certain cases, the information in your form may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government, is a party in a proceeding before the body or has an interest in the proceeding.

If you owe a past due debt to the federal government, the taxpayer identification number and other information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide this information to these agencies through the matching of computer records when authorized. If you do not provide the information requested on the form, your form may be returned without action or your form may be delayed. The foregoing Notice is required by the Privacy Act of 1974, Pub. L. No. 93-579, December 31, 1974, 5 U.S.C. § 552, and the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, *et seq.*

Public reporting burden for this collection of information is estimated to average 1.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden, to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, D.C. 20554.

BLOCK 1: HEADER INFORMATION

1. **471 Billed Entity Applicant Name** (30 characters maximum)
2. **471 Billed Entity Applicant Number** (10 digits maximum)
3. **Service Provider Identification Number (SPIN)** (9 digits maximum)
4. **Contact Name** (30 characters maximum)
5. **Contact Telephone Number** (14 digits maximum)
6. **Reimbursement Form Number** (assigned by Billed Entity Applicant--25 characters maximum)
7. **Reimbursement Form Date to SLC** (mm/dd/yyyy)
8. **Total Reimbursement Amount** (total of Block 2, Item 15 -- 14.2 digits maximum)

Billed Entity Applicant Reimbursement Form

For reimbursement of discounts on approved services already paid for by the Billed Entity Applicant.

471 Billed Entity Applicant Name _____ 471 Billed Entity Applicant Number _____ Contact Name _____

Contact Telephone Number _____ Reimbursement Form Number _____

BLOCK 2: LINE ITEM INFORMATION PER FUNDING REQUEST NUMBER

	(9)	(10)	(11)	(12)	(13)	(14)	(15)
	FCC Form 471 Application Number (10 digits) (from Funding Commitment Decisions Letter)	Funding Request Number (FRN) (10 digits) (from Funding Commitment Decisions Letter)	Bill Frequency	Customer Billed Date (mm/yyyy)	Shipping Date to Customer or Last Day of Work Performed (mm/dd/yyyy)	Total (Undiscounted) Amount for Service (14.2 digits max.)	Discount Amount Billed to SLC (14.2 digits max.)
			DO NOT WRITE IN THIS COLUMN.	For each FRN, complete either Column (12) or Column (13), but not both Columns		14.2 digits allows for dollars and cents	
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
TOTAL REIMBURSEMENT AMOUNT TO BE ENTERED INTO ITEM (8)							

BILLED ENTITY APPLICANT Reimbursement Form

471 Billed Entity Applicant Name _____

471 Billed Entity Applicant Number _____

Contact Person Name _____

Contact Telephone Number _____

Reimbursement Form Number _____

Block 3: Billed Entity Applicant Certification

I certify that I am authorized to submit this Billed Entity Applicant Reimbursement Form on behalf of the eligible schools, libraries, or consortia of those entities represented on this Form, and certify to the best of my knowledge, information and belief, as follows:

- A. The discount amounts listed in Column (15) of this Billed Entity Applicant Reimbursement Form represent charges for eligible services delivered to and used by eligible schools, libraries, or consortia of those entities for educational purposes, on or after the actual service start date reported on the associated Form 486.
- B. The discount amounts listed in Column (15) of this Billed Entity Applicant Reimbursement Form were already billed by the service provider and paid by the Billed Entity Applicant on behalf of eligible schools, libraries, and consortia of those entities.
- C. The discount amounts listed in Column (15) of this Billed Entity Applicant Reimbursement Form are for eligible services approved by the fund administrator pursuant to a Form 471 Funding Commitment Decisions Letter.
- D. I recognize that I may be audited pursuant to this application and will retain for five years any and all records that I rely upon to fill in this form.

16. Signature of authorized person (original ink signature required)

17. Date (required)

18. Printed name of authorized person (required)

19. Title or position of authorized person (required)

20. Telephone number of authorized person (required)

21. Address of authorized person (required)

BILLED ENTITY APPLICANT Reimbursement Form

471 Billed Entity Applicant Name _____

471 Billed Entity Applicant Number _____

Contact Person Name _____

Contact Telephone Number _____

Reimbursement Form Number _____

Block 4: Service Provider Acknowledgment

I certify that I am authorized to submit this Service Provider Acknowledgment for this Billed Entity Applicant Reimbursement Form, and acknowledge to the best of my knowledge, information and belief, as follows:

- A. The service provider must remit the discount amount authorized by the fund administrator to the Billed Entity Applicant who prepared and submitted this Billed Entity Applicant Reimbursement Form as soon as possible after the fund administrator's notification to the service provider of the amount of the approved discounts on this Billed Entity Applicant Reimbursement Form, but in no event later than 10 calendar days after receipt of the reimbursement payment from the fund administrator, subject to the restriction set forth in B. below.
- B. The service provider must remit payment of the approved discount amount to the Billed Entity Applicant prior to tendering or making use of the payment issued by the Universal Service Administrative Company to the service provider of the approved discounts for the Billed Entity Applicant Reimbursement Form.

22. Signature of authorized person (fax, copy or original signature)

23. Date (required)

24. Printed name of authorized person (required)

25. Title or position of authorized person (required)

26. Telephone number of authorized person (required)

27. Address of authorized person (required)

Page 4 of 4 pages

FCC Form 472 - October 1998

A paper copy of this Form (pages 1-4) should mailed to:

SLC-BEAR Form
P. O. Box 7026
Lawrence, KS 66044-7026

If sent by express delivery services or U.S. Postal Service, Return Receipt Requested, the form (pages 1-4) should be mailed to:

SLC-BEAR Form
c/o Ms. Smith
3833 Greenway Drive
Lawrence, KS 66046

CC Docket No. 02-6

Exhibit B



Universal Service Administrative Company
Schools & Libraries Division

RECOVERY OF ERRONEOUSLY DISBURSED FUNDS

June 20, 2003

Fay Reed
BellSouth Telecommunications, Inc.
675 West Peachtree St., Room 17M61-Bellsouth Center
Atlanta, GA 30375 6715

Re:

Funding Year: 1999 -2000
Form 471 Application Number: 139084
Applicant Name: ORLEANS PARISH SCHOOL DIST
Contact Person: SHARON MCCOY BELL
Contact Phone: 504-365-5484

Dear Service Provider Contact:

Reviews of Schools and Libraries Program disbursements occasionally reveal that funds were disbursed in error. Such discoveries may arise out of our periodic audits, attempts by applicants to reduce a funding commitment below the amount already disbursed, or other investigations resulting from our program compliance procedures. For example, funds may be disbursed in error when:

- Services were billed but were not delivered
- Services were billed in excess of the services delivered
- Services were returned but an appropriate refund to SLD was not made

The SLD has determined that the funds detailed on the attached FUNDING DISBURSEMENT SYNOPSIS were disbursed in error. This synopsis includes the specific funding requests, amounts, and reasons for recovery by Funding Request Number (FRN). The SLD must now recover the amount that was disbursed in error.

FUNDING DISBURSEMENT SYNOPSIS

On the pages following this letter, we have provided a Funding Disbursement Synopsis for the Form 471 application cited above. The enclosed report includes a list of the FRNs from this application for which recovery of erroneously disbursed funds is necessary.

Immediately preceding the Funding Disbursement Report, you will find a guide that defines each line of the Report. The SLD is also sending this information to the applicant named above.

TO APPEAL THIS DECISION

If you wish to appeal the decision indicated in this letter, your appeal must be **RECEIVED BY THE SCHOOLS AND LIBRARIES DIVISION (SLD) WITHIN 60 DAYS OF THE ABOVE DATE ON THIS LETTER**. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and e-mail address (if available) for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Identify which Recovery Of Erroneously Disbursed Funds you are appealing. Indicate the funding request number and date of the Disbursed Funds Recovery letter. Your letter of appeal must also include the applicant name, the Form 471 Application Number, and the Billed Entity Number from the top of your letter.
3. When explaining your appeal, include the precise language or text that is at the heart of your appeal. By pointing us to the exact words that give rise to your appeal, the SLD will be able to more readily understand and respond appropriately to your appeal. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep copies of your correspondence and documentation.
4. Provide an authorized signature on your letter of appeal.

If you are submitting your appeal on paper, please send your appeal to: Letter of Appeal, Schools and Libraries Division, Box 125 - Correspondence Unit, 80 South Jefferson Road, Whippany, NJ 07981. Additional options for filing an appeal can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site or by calling the Client Service Bureau. We encourage the use of either the e-mail or fax filing options to expedite filing your appeal.

While we encourage you to resolve your appeal with the SLD first, you have the option of filing an appeal directly with the Federal Communications Commission (FCC). You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be **RECEIVED BY THE FCC WITHIN 60 DAYS OF THE ABOVE DATE ON THIS LETTER**. Failure to meet this requirement will result in automatic dismissal of your appeal. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site or by calling the

Client Service Bureau. We strongly recommend that you use either the e-mail or fax filing options because of substantial delays in mail delivery to the FCC. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554.

Schools and Libraries Division
Universal Service Administrative Company

A GUIDE TO THE FUNDING DISBURSEMENT SYNOPSIS

Attached to this letter will be a report for each funding request from the application cited at the top of this letter for which a Recovery of Erroneously Disbursed Funds is required. We are providing the following definitions.

- **FUNDING REQUEST NUMBER (FRN):** A Funding Request Number is assigned by the SLD to each request in Block 5 of your Form 471 once an application has been processed. This number is used to report to applicants and service providers the status of individual discount funding requests submitted on a Form 471.
- **SPIN (Service Provider Identification Number):** A unique number assigned by the Universal Service Administrative Company to service providers seeking payment from the Universal Service Fund for participating in the universal service support programs.
- **SERVICE PROVIDER:** The legal name of the service provider.
- **CONTRACT NUMBER:** The number of the contract between the applicant and the service provider. This will be present only if a contract number was provided on the Form 471.
- **SERVICES ORDERED:** The type of service ordered from the service provider, as shown on Form 471.
- **SITE IDENTIFIER:** The Entity Number listed on Form 471 for "site specific" FRNs.
- **BILLING ACCOUNT NUMBER:** The account number that was established for billing purposes. This will be present only if a Billing Account Number was provided on the Form 471.
- **FUNDING COMMITMENT:** This represents the total amount of requested funding that the SLD committed to this FRN.
- **FUNDS DISBURSED TO DATE:** This represents the total funds that have been paid to you for this FRN.
- **FUNDS TO BE RECOVERED:** This represents the amount of Erroneously Funds Disbursed to Date. These erroneously disbursed funds will have to be recovered.
- **DISBURSED FUNDS RECOVERY EXPLANATION:** This entry provides a description of the reason SLD is seeking the recovery.

Funding Disbursement Synopsis for Application Number: 139084

Funding Request Number: 214629 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80173 ABRAMS ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$6,103.49
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$851.71
Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,103.49. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$851.71 (\$6,955.20 less \$6,103.49).

Funding Request Number: 214654 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80008 ALLEN FUNDAMENTAL MAGNET SCHOOL
Billing Account Number:
Funding Commitment: \$5,722.67
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,232.53
Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,722.67. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,232.53 (\$6,955.20 less \$5,722.67).

Funding Request Number: 214655 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 79996 BAUDUIT ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$5,995.44
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$959.76

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,995.44. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$959.76 (\$6,955.20 less \$5,995.44).

Funding Request Number: 214657 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80062 MARY BETHUNE ELEMENTARY SCH
Billing Account Number:
Funding Commitment: \$6,489.85
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$465.35

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,489.85. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$465.35 (\$6,955.20 less \$6,489.85).

Funding Request Number: 214660 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80116 BIENVILLE ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$6,416.48
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$538.72

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,416.48. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$538.72 (\$6,955.20 less \$6,416.48).

Funding Request Number: 214665 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80100 JUVENILE ALT SCHOOL
Billing Account Number:
Funding Commitment: \$3.78
Funds Disbursed to Date: \$1,545.60
Funds to be Recovered: \$1,541.82

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$1,545.60, the actual charges incurred for this service only amounted to a post-discount amount of \$3.78. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,541.82 (\$1,545.60 less \$3.78).

Funding Request Number: 214668 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80031 NEW ORLEANS MARINE INSTITUTE
Billing Account Number:
Funding Commitment: \$110.12
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$6,845.08

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,845.08. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$110.12 (\$6,955.20 less \$6,845.08).

Funding Request Number: 214695 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80158 CLARK SR HIGH SCHOOL
Billing Account Number:
Funding Commitment: \$4,961.06
Funds Disbursed to Date: \$6,182.40
Funds to be Recovered: \$1,221.34

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,182.40, the actual charges incurred for this service only amounted to a post-discount amount of \$4,961.06. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,221.34 (\$6,182.40 less \$4,961.06).

Funding Request Number: 214715 SPIN: 143004824

Service Provider: BellSouth Telecommunications, Inc.

Contract Number: C

Services Ordered: DEDICATED SERVICES

Site Identifier: 80025 MCDONOGH HIGH SCHOOL 35

Billing Account Number:

Funding Commitment: \$4,142.31

Funds Disbursed to Date: \$6,182.40

Funds to be Recovered: \$2,040.09

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,182.40, the actual charges incurred for this service only amounted to a post-discount amount of \$4,142.31. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$2,040.09 (\$6,182.40 less \$4,142.31).

Funding Request Number: 214724 SPIN: 143004824

Service Provider: BellSouth Telecommunications, Inc.

Contract Number: C

Services Ordered: DEDICATED SERVICES

Site Identifier: 80043 FREDERICK A DOUGLASS HIGH SCH

Billing Account Number:

Funding Commitment: \$5,166.16

Funds Disbursed to Date: \$6,955.20

Funds to be Recovered: \$1,789.04

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,166.16. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,789.04 (\$6,955.20 less \$5,166.16).

Funding Request Number: 214749 SPIN: 143004824

Service Provider: BellSouth Telecommunications, Inc.

Contract Number: C

Services Ordered: DEDICATED SERVICES

Site Identifier: 80202 REED SR HIGH SCHOOL

Billing Account Number:

Funding Commitment: \$4,594.94

Funds Disbursed to Date: \$6,182.40

Funds to be Recovered: \$1,587.46

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,182.40, the actual charges incurred for this service only amounted to a post-discount amount of \$4,594.94. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,587.46 (\$6,182.40 less \$4,594.94).

Funding Request Number: 214753 SPIN: 143004824

Service Provider: BellSouth Telecommunications, Inc.

Contract Number: C

Services Ordered: DEDICATED SERVICES

Site Identifier: 79970 URBAN LEAGUE ST ACAD SCHOOL

Billing Account Number:

Funding Commitment: \$4,960.61

Funds Disbursed to Date: \$6,955.20

Funds to be Recovered: \$1,994.59

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$4,960.61. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,994.59 (\$6,955.20 less \$4,960.61).

Funding Request Number: 214756 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80071 NEW ORLEANS CREATIVE ARTS CTR
Billing Account Number:
Funding Commitment: \$1,229.78
Funds Disbursed to Date: \$1,545.60
Funds to be Recovered: \$315.82

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$1,545.60, the actual charges incurred for this service only amounted to a post-discount amount of \$1,229.78. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$315.82 (\$1,545.60 less \$1,229.78).

Funding Request Number: 214761 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 79968 NEW ORLEANS HEALTH CAREERS CTR
Billing Account Number:
Funding Commitment: \$1,261.66
Funds Disbursed to Date: \$1,545.60
Funds to be Recovered: \$283.94

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$1,545.60, the actual charges incurred for this service only amounted to a post-discount amount of \$1,261.66. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$283.94 (\$1,545.60 less \$1,261.66).

Funding Request Number: 214764 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80145 NEW ORLEANS SCIENCE-MATH SCH
Billing Account Number:
Funding Commitment: \$1,045.73
Funds Disbursed to Date: \$1,545.60
Funds to be Recovered: \$499.87

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$1,545.60, the actual charges incurred for this service only amounted to a post-discount amount of \$1,045.73. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$499.87 (\$1,545.60 less \$1,045.73).

Funding Request Number: 214770 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 164485 GEORGE WASHINGTON CARVER MIDDLE EXTENSION
Billing Account Number:
Funding Commitment: \$266.46
Funds Disbursed to Date: \$6,182.40
Funds to be Recovered: \$5,915.94

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,182.40, the actual charges incurred for this service only amounted to a post-discount amount of \$266.46. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$5,915.94 (\$6,182.40 less \$266.46).

Funding Request Number: 214787 SPIN: 143004824

Service Provider: BellSouth Telecommunications, Inc.

Contract Number: C

Services Ordered: DEDICATED SERVICES

Site Identifier: 80113 YOUTH STUDY CENTER

Billing Account Number:

Funding Commitment: \$127.38

Funds Disbursed to Date: \$1,545.60

Funds to be Recovered: \$1,418.22

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$1,545.60, the actual charges incurred for this service only amounted to a post-discount amount of \$127.38. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,418.22 (\$1,545.60 less \$127.38).

Funding Request Number: 214792 SPIN: 143004824

Service Provider: BellSouth Telecommunications, Inc.

Contract Number: C

Services Ordered: DEDICATED SERVICES

Site Identifier: 80014 CROCKER ELEMENTARY SCHOOL

Billing Account Number:

Funding Commitment: \$6,123.15

Funds Disbursed to Date: \$6,955.20

Funds to be Recovered: \$832.05

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,123.15. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$832.05 (\$6,955.20 less \$6,123.15).

Funding Request Number: 214796 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80098 CROSSMAN ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$5,872.70
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,082.50

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,872.70. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,082.50 (\$6,955.20 less \$5,872.70).

Funding Request Number: 214799 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80179 ERNEST MORIAL SCHOOL
Billing Account Number:
Funding Commitment: \$6,718.15
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$237.05

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,718.15. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$237.05 (\$6,955.20 less \$6,718.15).

Funding Request Number: 214800 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80154 MARY CHURCH TERRELL ELEM SCH
Billing Account Number:
Funding Commitment: \$5,564.59
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,390.61

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,564.59. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,390.61 (\$6,955.20 less \$5,564.59).

Funding Request Number: 214801 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80091 DIBERT ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$6,195.72
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$759.48

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,195.72. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$759.48 (\$6,955.20 less \$6,195.72).

Funding Request Number: 214803 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80038 EDISON ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$6,080.38
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$874.82

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,080.38. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$874.82 (\$6,955.20 less \$6,080.38).

Funding Request Number: 214804 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80185 EDWARDS ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$6,423.70
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$531.50

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,423.70. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$531.50 (\$6,955.20 less \$6,423.70).

Funding Request Number: 214805 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 79988 FISCHER ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$6,209.59
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$745.61

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,209.59. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$745.61 (\$6,955.20 less \$6,209.59).

Funding Request Number: 214812 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80041 FRANTZ ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$6,199.06
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$756.14

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,199.06. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$756.14 (\$6,955.20 less \$6,199.06).

Funding Request Number: 214815 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80050 ORETHA CASTLE HALEY ELEMENTARY
Billing Account Number:
Funding Commitment: \$6,227.33
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$727.87

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,227.33. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$727.87 (\$6,955.20 less \$6,227.33).

Funding Request Number: 214817 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80128 GENTILLY TERRACE ELEM SCHOOL
Billing Account Number:
Funding Commitment: \$6,022.65
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$932.55

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,022.65. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$932.55 (\$6,955.20 less \$6,022.65).

Funding Request Number: 214820 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80122 GORDON ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$3,866.38
Funds Disbursed to Date: \$4,636.80
Funds to be Recovered: \$770.42

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$4,636.80, the actual charges incurred for this service only amounted to a post-discount amount of \$3,866.38. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$770.42 (\$4,636.80 less \$3,866.38).

Funding Request Number: 214828 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 79977 GUSTE ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$4,319.16
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$2,636.04

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$4,319.16. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$2,636.04 (\$6,955.20 less \$4,319.16).

Funding Request Number: 214831 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 79991 HABANS ELEMENTARY SCHOOL
Billing Account Number:

Funding Commitment: \$6,339.18
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$616.02

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,339.18. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$616.02 (\$6,955.20 less \$6,339.18).

Funding Request Number: 214849 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80164 HOFFMAN ELEMENTARY SCHOOL
Billing Account Number:

Funding Commitment: \$5,903.62
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,051.58

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,903.62. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,051.58 (\$6,955.20 less \$5,903.62).

Funding Request Number: 214860 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 79995 NEW ORLEANS FREE SCHOOL
Billing Account Number:
Funding Commitment: \$5,631.80
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,323.40

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,631.80. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,323.40 (\$6,955.20 less \$5,631.80).

Funding Request Number: 214873 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80131 CAPDAU JUNIOR HIGH SCHOOL
Billing Account Number:
Funding Commitment: \$6,715.60
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$239.60

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,715.60. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$239.60 (\$6,955.20 less \$6,715.60).

Funding Request Number: 214890 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 79985 MCDONOGH ELEMENTARY SCHOOL 32
Billing Account Number:
Funding Commitment: \$6,044.42
Funds Disbursed to Date: \$6,182.40
Funds to be Recovered: \$137.98

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,182.40, the actual charges incurred for this service only amounted to a post-discount amount of \$6,044.42. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$137.98 (\$6,182.40 less \$6,044.42).

Funding Request Number: 214902 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 79993 ARTHUR ASHE SCHOOL
Billing Account Number:
Funding Commitment: \$5,676.68
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,278.52

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,676.68. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,278.52 (\$6,955.20 less \$5,676.68).

Funding Request Number: 214907 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80177 BARBARA JORDAN ELEMENTARY SCH
Billing Account Number:
Funding Commitment: \$6,097.74
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$857.46

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,097.74. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$857.46 (\$6,955.20 less \$6,097.74).

Funding Request Number: 214909 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80083 MCDONOGH ELEMENTARY SCHOOL 42
Billing Account Number:
Funding Commitment: \$6,292.21
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$662.99

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,292.21. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$662.99 (\$6,955.20 less \$6,292.21).

Funding Request Number: 214911 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 79980 HARRIET R TUBMAN ELEM SCHOOL
Billing Account Number:
Funding Commitment: \$6,683.01
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$272.19
Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,683.01. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$272.19 (\$6,955.20 less \$6,683.01).

Funding Request Number: 214913 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80157 MOTON ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$6,129.38
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$825.82
Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,129.38. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$825.82 (\$6,955.20 less \$6,129.38).

Funding Request Number: 214930 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80046 LORRAINE HANSBERRY ELEMENTARY
Billing Account Number:
Funding Commitment: \$6,278.04
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$677.16

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,278.04. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$677.16 (\$6,955.20 less \$6,278.04).

Funding Request Number: 214939 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80048 SHAW ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$5,950.93
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,004.27

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,950.94. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,004.26 (\$6,955.20 less \$5,950.94).

Funding Request Number: 214944 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80199 SHERWOOD FOREST ELEM SCHOOL
Billing Account Number:
Funding Commitment: \$6,506.15
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$449.05

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,506.15. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$449.05 (\$6,955.20 less \$6,506.15).

Funding Request Number: 214948 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80042 DR CHARLES DREW ELEMENTARY
Billing Account Number:
Funding Commitment: \$5,797.85
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,157.35

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,797.85. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,157.35 (\$6,955.20 less \$5,797.85).

Funding Request Number: 214953 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80086 WHEATLEY ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$6,257.29
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$697.91

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,257.30. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$697.91 (\$6,955.20 less \$6,257.30).

Funding Request Number: 214957 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80080 LANGSTON HUGHES ELEM SCHOOL
Billing Account Number:
Funding Commitment: \$5,358.92
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,596.28

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,358.92. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,596.28 (\$6,955.20 less \$5,358.92).

Funding Request Number: 214960 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 79971 WICKER ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$5,598.06
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,357.14

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,598.06. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,357.14 (\$6,955.20 less \$5,598.06).

Funding Request Number: 214962 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80160 WILLIAMS ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$5,865.83
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,089.37

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,865.83. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,089.37 (\$6,955.20 less \$5,865.83).

Funding Request Number: 214966 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80166 WILSON ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$5,959.12
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$996.08

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,959.13. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$996.08 (\$6,955.20 less \$5,959.13).

Funding Request Number: 214969 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80063 AUDUBON MONTESSORI SCHOOL
Billing Account Number:
Funding Commitment: \$3,101.21
Funds Disbursed to Date: \$3,864.00
Funds to be Recovered: \$762.79

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$3,864.00, the actual charges incurred for this service only amounted to a post-discount amount of \$3,101.21. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$762.79 (\$3,864.00 less \$3,101.21).

Funding Request Number: 214972 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 79981 BEHRMAN ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$6,398.85
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$556.35

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,398.85. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$556.35 (\$6,955.20 less \$6,398.85).

Funding Request Number: 214975 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80015 GREEN MIDDLE SCHOOL
Billing Account Number:
Funding Commitment: \$4,618.29
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$2,336.91

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$4,618.29. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$2,336.91 (\$6,955.20 less \$4,618.29).

Funding Request Number: 214982 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80099 ISRAEL AUGUSTINE MIDDLE SCHOOL
Billing Account Number:
Funding Commitment: \$6,697.78
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$257.42

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,697.78. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$257.42 (\$6,955.20 less \$6,697.78).

Funding Request Number: 214985 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80004 WRIGHT MIDDLE SCHOOL
Billing Account Number:
Funding Commitment: \$6,376.38
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$578.82

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,376.38. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$578.82 (\$6,955.20 less \$6,376.38).

Funding Request Number: 214989 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80127 BRADLEY ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$4,821.30
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$2,133.90

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$4,821.30. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$2,133.90 (\$6,955.20 less \$4,821.30).

Funding Request Number: 214993 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80155 CHESTER ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$5,526.96
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,428.24

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,526.96. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,428.24 (\$6,955.20 less \$5,526.96).

Funding Request Number: 214996 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80176 PARKVIEW FUNDAMENTAL SCHOOL
Billing Account Number:
Funding Commitment: \$6,321.43
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$633.77

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,321.43. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$633.77 (\$6,955.20 less \$6,321.43).

Funding Request Number: 215005 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80172 COGHILL ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$5,708.52
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,246.68

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,708.52. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,246.68 (\$6,955.20 less \$5,708.52).

Funding Request Number: 215008 SPIN: 143004824

Service Provider: BellSouth Telecommunications, Inc.

Contract Number: C

Services Ordered: DEDICATED SERVICES

Site Identifier: 80023 TUREAUD A P ELEMENTARY SCHOOL

Billing Account Number:

Funding Commitment: \$6,036.92

Funds Disbursed to Date: \$6,955.20

Funds to be Recovered: \$918.28

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,036.92. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$918.28 (\$6,955.20 less \$6,036.92).

Funding Request Number: 215014 SPIN: 143004824

Service Provider: BellSouth Telecommunications, Inc.

Contract Number: C

Services Ordered: DEDICATED SERVICES

Site Identifier: 80029 CRAIG ELEMENTARY SCHOOL

Billing Account Number:

Funding Commitment: \$5,853.17

Funds Disbursed to Date: \$6,955.20

Funds to be Recovered: \$1,102.03

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,853.17. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,102.03 (\$6,955.20 less \$5,853.17).

Funding Request Number: 215022 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80201 VILLAGE DEL'EST ELEM SCHOOL
Billing Account Number:
Funding Commitment: \$6,789.36
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$165.84

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,789.36. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$165.84 (\$6,955.20 less \$6,789.36).

Funding Request Number: 215025 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80215 EISENHOWER ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$5,761.56
Funds Disbursed to Date: \$6,182.40
Funds to be Recovered: \$420.84

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,182.40, the actual charges incurred for this service only amounted to a post-discount amount of \$5,761.56. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$420.84 (\$6,182.40 less \$5,761.56).

Funding Request Number: 215026 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80196 GAUDET ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$6,048.95
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$906.25

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,048.95. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$906.25 (\$6,955.20 less \$6,048.95).

Funding Request Number: 215030 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80204 JACKSON ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$5,545.24
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,409.96

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,545.24. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,409.96 (\$6,955.20 less \$5,545.24).

Funding Request Number: 215032 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80057 JOHNSON ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$5,549.32
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,405.88

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,549.32. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,405.88 (\$6,955.20 less \$5,549.32).

Funding Request Number: 215033 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80078 JONES ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$6,099.65
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$855.55

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,099.65. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$855.55 (\$6,955.20 less \$6,099.65).

Funding Request Number: 215035 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80017 LAFON ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$5,545.58
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,409.62

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,545.58. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,409.62 (\$6,955.20 less \$5,545.58).

Funding Request Number: 215036 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80175 LAKE FOREST MONTESSORI
Billing Account Number:
Funding Commitment: \$4,723.62
Funds Disbursed to Date: \$6,182.40
Funds to be Recovered: \$1,458.78

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,182.40, the actual charges incurred for this service only amounted to a post-discount amount of \$4,723.62. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,458.78 (\$6,182.40 less \$4,723.62).

Funding Request Number: 216020 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80060 DR RONALD E MCNAIR ELEM SCHOOL
Billing Account Number:
Funding Commitment: \$6,239.66
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$715.54

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,239.66. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$715.54 (\$6,955.20 less \$6,239.66).

Funding Request Number: 216021 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80001 LEWIS ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$4,774.01
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$2,181.19

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$4,774.01. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$2,181.19 (\$6,955.20 less \$4,774.01).

Funding Request Number: 216022 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80188 LITTLE WOODS ELEM SCHOOL
Billing Account Number:
Funding Commitment: \$6,828.93
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$126.27

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,828.93. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$126.27 (\$6,955.20 less \$6,828.93).

Funding Request Number: 216025 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80045 LOCKETT ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$5,833.29
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,121.91

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,833.29. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,121.91 (\$6,955.20 less \$5,833.29).

/

Funding Request Number: 216026 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 79987 FRANKLIN ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$4,027.34
Funds Disbursed to Date: \$4,636.80
Funds to be Recovered: \$609.46

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$4,636.80, the actual charges incurred for this service only amounted to a post-discount amount of \$4,027.34. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$609.46 (\$4,636.80 less \$4,027.34).

Funding Request Number: 216027 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80054 MCDONOGH ELEMENTARY SCHOOL 07
Billing Account Number:
Funding Commitment: \$6,607.07
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$348.13

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,607.07. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$348.13 (\$6,955.20 less \$6,607.07).

Funding Request Number: 216030 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80028 MCDONOGH ELEMENTARY SCHOOL 15
Billing Account Number:
Funding Commitment: \$6,009.89
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$945.31

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,009.89. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$945.31 (\$6,955.20 less \$6,009.89).

Funding Request Number: 216037 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80036 MARTIN LUTHER KING ELEM SCH
Billing Account Number:
Funding Commitment: \$6,849.56
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$105.64

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,849.56. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$105.64 (\$6,955.20 less \$6,849.56).

Funding Request Number: 216038 SPIN: 143004824

Service Provider: BellSouth Telecommunications, Inc.

Contract Number: C

Services Ordered: DEDICATED SERVICES

Site Identifier: 80035 ARMSTRONG ELEMENTARY

Billing Account Number:

Funding Commitment: \$5,990.24

Funds Disbursed to Date: \$6,955.20

Funds to be Recovered: \$964.96

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,990.24. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$964.96 (\$6,955.20 less \$5,990.24).

Funding Request Number: 216039 SPIN: 143004824

Service Provider: BellSouth Telecommunications, Inc.

Contract Number: C

Services Ordered: DEDICATED SERVICES

Site Identifier: 80064 BENJAMIN BANNEKER JR. ELEMENTARY

Billing Account Number:

Funding Commitment: \$6,701.16

Funds Disbursed to Date: \$6,955.20

Funds to be Recovered: \$254.04

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,701.16. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$254.04 (\$6,955.20 less \$6,701.16).

Funding Request Number: 216044 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: INTERNAL CONNECTIONS
Site Identifier: 80089 MORRIS F.X. JEFF SR. ELEMENTARY SCHOOL
Billing Account Number:
Funding Commitment: \$6,253.70
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$701.50

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,253.70. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$701.50 (\$6,955.20 less \$6,253.70).

Funding Request Number: 216046 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80085 MCDONOGH JUNIOR HIGH SCHOOL 28
Billing Account Number:
Funding Commitment: \$5,547.91
Funds Disbursed to Date: \$6,182.40
Funds to be Recovered: \$634.49

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,182.40, the actual charges incurred for this service only amounted to a post-discount amount of \$5,547.91. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$634.49 (\$6,182.40 less \$5,547.91).

Funding Request Number: 216047 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 79975 MAHALIA JACKSON SCHOOL
Billing Account Number:

Funding Commitment: \$5,668.90
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,286.30

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,668.90. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,286.30 (\$6,955.20 less \$5,668.90).

Funding Request Number: 216048 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: C
Services Ordered: DEDICATED SERVICES
Site Identifier: 80129 MCDONOGH ELEMENTARY SCHOOL 39
Billing Account Number:

Funding Commitment: \$6,573.81
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$381.39

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,573.81. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$381.39 (\$6,955.20 less \$6,573.81).

Funding Request Number: 274783 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: CONTRACT
Services Ordered: DEDICATED SERVICES
Site Identifier: 80114 VORICE JACKSON WATERS ELE SCH
Billing Account Number:
Funding Commitment: \$6,511.61
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$443.59

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,511.61. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$443.59 (\$6,955.20 less \$6,511.61).

Funding Request Number: 274798 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: CONTRACT
Services Ordered: DEDICATED SERVICES
Site Identifier: 79972 MYRTLE R. BANKS ELEMENTARY SCH
Billing Account Number:
Funding Commitment: \$6,180.40
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$774.80

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,180.40. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$774.80 (\$6,955.20 less \$6,180.40).

Funding Request Number: 274805 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: CONTRACT
Services Ordered: DEDICATED SERVICES
Site Identifier: 80088 GEORGE MONDY ELEMENTARY SCHOOL
Billing Account Number:

Funding Commitment: \$5,572.19
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,383.01

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,572.19. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,383.01 (\$6,955.20 less \$5,572.19).

Funding Request Number: 274807 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: CONTRACT
Services Ordered: DEDICATED SERVICES
Site Identifier: 179496 EAST NEW ORLEANS EDUCATIONAL CENTER
Billing Account Number:

Funding Commitment: \$5,493.11
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$1,462.09

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$5,493.11. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$1,462.09 (\$6,955.20 less \$5,493.11).

Funding Request Number: 274809 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: CONTRACT
Services Ordered: DEDICATED SERVICES
Site Identifier: 202558 MIDDLE LEVEL ALTERNATIVE SCHOOL
Billing Account Number:
Funding Commitment: \$1,017.28
Funds Disbursed to Date: \$1,545.60
Funds to be Recovered: \$528.32

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$1,545.60, the actual charges incurred for this service only amounted to a post-discount amount of \$1,017.28. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$528.32 (\$1,545.60 less \$1,017.28).

Funding Request Number: 278561 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: CONTRACT
Services Ordered: DEDICATED SERVICES
Site Identifier: 184831 MARTIN LUTHER KING JR. EXTENSION
Billing Account Number:
Funding Commitment: \$6,465.12
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$490.08

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$6,465.12. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$490.08 (\$6,955.20 less \$6,465.12).

Funding Request Number: 278567 SPIN: 143004824
Service Provider: BellSouth Telecommunications, Inc.
Contract Number: CONTRACT
Services Ordered: DEDICATED SERVICES
Site Identifier: 202559 NEW ORLEANS CHARTER MIDDLE SCHOOL
Billing Account Number:
Funding Commitment: \$4,343.41
Funds Disbursed to Date: \$6,955.20
Funds to be Recovered: \$2,611.79

Disbursed Funds Recovery Explanation:

An audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request. Although the applicant was funded for the post-discount amount of \$6,955.20, the actual charges incurred for this service only amounted to a post-discount amount of \$4,343.41. The SLD is unable to disburse funds for services that were not delivered. Therefore the SLD must seek recovery of the erroneously disbursed amount of \$2,611.79 (\$6,955.20 less \$4,343.41).

CC Docket No. 02-6

Exhibit C

BellSouth Corporation
Legal Department
675 West Peachtree Street, N.W.
Suite 4300
Atlanta, GA 30375-0001

lisa.foshee@bellsouth.com

Lisa S. Foshee
Senior Corporate Counsel-Regulatory

404 335 0754
Fax 404 614 4054

August 19, 2003

APPEAL OF COMMITMENT ADJUSTMENT LETTER

Letter of Appeal
Schools and Libraries Division
Universal Service Administrative Company
Box 125 - Correspondence Unit
80 South Jefferson Road
Whippany, NJ 07981

RE: APPEAL OF COMMITMENT ADJUSTMENT
Funding Year: 1999-2000
Funding Request Number: *See Footnote below*¹
SPIN: 143004824
Form 471 Application Number: 139084
Applicant Name: Orleans Parish School District
Contact Person: Tom Snell Contact Phone: 318-368-9715

To Whom It May Concern:

Please accept this letter as an appeal of the Commitment Adjustment Letter dated June 20, 2003, served on BellSouth Telecommunications, Inc. concerning the above-stated Applicant and Form 471 Application Number. In the Commitment Adjustment Letter, the SLD provided as follows:

The SLD has determined that the funds detailed on the attached FUNDING DISBURSEMENT SYNOPSIS were disbursed in error. This synopsis includes

¹ 214629; 214654; 214655; 214657; 214660; 214665; 214668; 214695; 214715; 214724; 214749; 214753; 214756; 214761; 214764; 214770; 214787; 214792; 214796; 214799; 214800; 214801; 214803; 214804; 214805; 214812; 214815; 214817; 214820; 214828; 214831; 214849; 214860; 214873; 214890; 214902; 214907; 214909; 214911; 214913; 214930; 214939; 214944; 214948; 214953; 214957; 214960; 214962; 214966; 214969; 214972; 214975; 214982; 214985; 214989; 214993; 214996; 215005; 215008; 215014; 215022; 215025; 215026; 215030; 215032; 215033; 215035; 215036; 216020; 216021; 216022; 216025; 216026; 216027; 216030; 216037; 216038; 216039; 216044; 216046; 216047; 216048; 274783; 274798; 274805; 274807; 274809; 278561; 278567

the specific funding requests, amounts, and reasons for recovery by Funding Request Number (FRN).

Under each synopsis, the SLD states that “[a]n audit determined that the applicant had successfully invoiced the SLD in excess of the actual charges incurred for this funding request.” The SLD then states that “the SLD must now recover the amount that was disbursed in error.” Notably, the SLD never states that it seeks to recover the funds from BellSouth, but that, BellSouth assumes, is the intention of the letter.

BellSouth appeals this decision on the grounds that the funds “disbursed in error” that SLD seeks to collect were disbursed solely due to an error by the Applicant. As the SLD is aware, pursuant to SLD procedure, the service provider (BellSouth in this case) has no responsibility or obligation to verify the amounts identified by the Applicant on the BEAR form. Rather, it is the Applicant’s responsibility to verify the numbers and to submit the correct information to SLD. This division of responsibility between the Applicant and the SP is apparent from the fact that the Applicant has the obligation to certify (via signature) to the veracity of the information contained in the BEAR form, while the SP only is obligated to certify that they will remit the authorized amount to the applicant as soon as possible and prior to tendering the payment issued to the SP.

The SLD should recover the excess funds in this case from the party in error – in this case, the Applicant. If the party responsible for certifying to the veracity of the amounts claimed in the BEAR form is not the party whom is held responsible if those amounts are wrong, there is no incentive for the Applicant to do any due diligence to verify its filings. Under the SLD’s current process, the Applicant can submit the BEAR form without regard to whether its numbers are correct, taking comfort in the fact that it is the SP that will have to reimburse the SLD, not the Applicant itself. This misallocation of responsibility is exacerbated by the fact that it is unlikely BellSouth has any legal recourse against the Applicant now, and thus has no way to recoup the funds from the Applicant once they are remitted to the SLD.

The SLD’s decision to use BellSouth as a collection agent in this case is inappropriate and should be reconsidered. BellSouth is not the proper party to verify the numbers submitted to the SLD, and thus should not be the party who is harmed if the numbers prove incorrect.

Moreover, the Commission already has concluded that “the proposed recovery plan [adopted by the FCC in CC Docket Nos. 97-21 and 96-45] is not intended to cover the rare cases in which the Commission has determined that a school or library has engaged in waste, fraud, or abuse.”² In such cases, the Commission will address the situation “on a case-by-case basis” and not in a perfunctory manner such as appears to be the case in this Commitment Adjustment.³ While BellSouth certainly does not think that the Orleans School District engaged in waste, fraud or abuse, the rationale for holding the Applicant directly responsible for unintentional errors such

² *In the Matters of Changes to the Board of Directors of the National Exchange Carrier Association, Inc. and Federal-State Joint Board on Universal Service*, CC Docket Nos. 97-21 and 96-45, October 26, 2000, at ¶ 13.

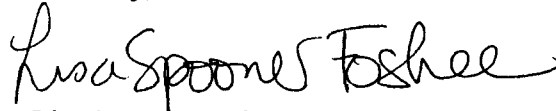
³ *Id.*

Appeal of Commitment Adjustment Letter
August 19, 2003
Page 3

as were made in this case is the same as the rationale for holding the Applicant responsible for misconduct --- the responsibility for adherence to the rules (whether unintentional as in this case or intentional in the case of fraud) must lay with the party that can best ensure compliance.

Based on these facts, BellSouth respectfully requests that the SLD grant this appeal and conduct an investigation into the grounds in this case that would preclude the application of SLD's funding recovery plan. Thank you for your attention to this matter. Please contact me with any further questions or comments.

Sincerely,

A handwritten signature in black ink that reads "Lisa Spooner Foshee". The signature is written in a cursive, flowing style.

Lisa Spooner Foshee
Ph (404) 335-0754
Fax (404) 614-4054
Lisa.foshee@BellSouth.com

CC Docket No. 02-6

Exhibit D

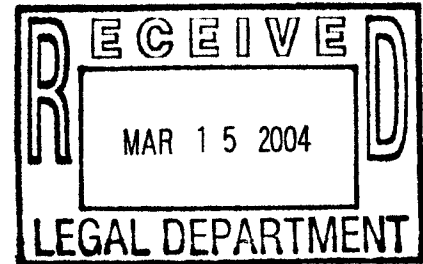


Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal - Funding Year 1999-2000

March 10, 2004

Lisa Spooner Foshee
Bell South Corporation
675 West Peachtree Street, N.W.
Suite 4300
Atlanta, GA 30375-001



Re: Orleans Parish School District

Re: Billed Entity Number: 139223
471 Application Number: 139084
Funding Request Number(s): 214629, 214654, 214655, 214657, 214660,
214665, 214668, 214695, 214715, 214724,
214749, 214753, 214756, 214761, 214764,
214770, 214787, 214792, 214796, 214799,
214800, 214801, 214803, 214804, 214805,
214812, 214815, 214817, 214820, 214828,
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214902, 217907, 214909, 214911, 214913,
214930, 214939, 214944, 214948, 214953,
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214993, 214996, 215005, 215008, 215014,
215022, 215025, 215026, 215030, 215032,
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216022, 216025, 216026, 216027, 216030,
216037, 216038, 216039, 216044, 216046,
216047, 216048, 274783, 274798, 247805,
274807, 274809, 248561, 278567

Your Correspondence Dated: August 19, 2003

After thorough review and investigation of all relevant facts, the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") has made its decision in regard to your appeal of SLD's Year 1999 Funding Commitment Decision for the Application Number indicated above. This letter explains the basis of SLD's decision. The date of this letter begins the 60-day time period for appealing this decision to the Federal Communications Commission ("FCC"). If your letter of appeal included

more than one Application Number, please note that for each application for which an appeal is submitted, a separate letter is sent.

Funding Request Number: 214629, 214654, 214655, 214657, 214660, 214665, 214668, 214695, 214715, 214724, 214749, 214753, 214756, 214761, 214764, 214770, 214787, 214792, 214796, 214799, 214800, 214801, 214803, 214804, 214805, 214812, 214815, 214817, 214820, 214828, 214831, 214849, 214860, 214873, 214890, 214902, 217907, 214909, 214911, 214913, 214930, 214939, 214944, 214948, 214953, 214957, 214960, 214962, 214966, 214969, 214972, 214975, 214982, 214985, 214989, 214993, 214996, 215005, 215008, 215014, 215022, 215025, 215026, 215030, 215032, 215033, 215035, 215036, 216020, 216021, 216022, 216025, 216026, 216027, 216030, 216037, 216038, 216039, 216044, 216046, 216047, 216048, 274783, 274798, 247805, 274807, 274809, 248561, 278567

Decision on Appeal: **Denied in full**

Explanation:

- You have stated that you are appealing SLD's decision on the grounds that the funds disbursed in error were disbursed solely due to an error on the part of the applicant. You state that BellSouth has no responsibility or obligation to verify the amounts identified by the applicant on the submitted Form 472 (BEAR). You feel that it is solely the responsibility of the applicant to verify that the reimbursement amounts are correct. You state that the SLD should recover the funds from the party that is in error, in this case the applicant. You state that under the SLD's current process the applicant can submit the BEAR form without regard to whether the numbers are correct, taking comfort in the fact that it is the service provider that will ultimately have to reimburse the SLD if there is an error. You state that the SLD decision to use Bell South as a collection agent in this case is inappropriate and should be reconsidered. You also note that this is not a situation where the applicant engaged in waste, fraud or abuse, but feel that the circumstances warrant seeking recovery from the applicant. You would like SLD to reconsider its decision to seek recovery from Bell South.
- FCC rules require the SLD to seek repayment of funds from service providers when the SLD determines that funds have been disbursed in error. *See In re Changes to the Board of Directors of the National Exchange Carrier Association*, CC Docket Nos. 97-21, 96-45, FCC 99-291 ¶¶ 8-9 (rel. October 8, 1999). The FCC stated that repayment would be sought "from service providers rather than schools and libraries because, unlike schools and libraries that receive discounted services, service providers actually receive disbursements of funds from the universal service support mechanism." *Id.* at ¶ 8. The FCC has further stated that "[w]e also emphasize that the proposed recovery plan is not intended to cover

the rare cases in which the Commission has determined that a school or library has engaged in waste, fraud or abuse. The Commission will address those situations on a case-by case basis.” *In re Changes to the Board of Directors of the National Exchange Carrier Association*, CC Docket Nos. 97-21, 96-45, FCC 00-350 (rel. October 26, 2000). Since the FCC has not authorized the SLD to seek recovery from schools or libraries when funds have been disbursed in error, your appeal is denied.

If you believe there is a basis for further examination of your application, you may file an appeal with the Federal Communications Commission (FCC). You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be **POSTMARKED** within 60 days of the above date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site or by contacting the Client Service Bureau. We strongly recommend that you use either the e-mail or fax filing options.

We thank you for your continued support, patience, and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company

CC Docket No. 02-6

Exhibit E

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Schools and Libraries Universal Service)	
Support Mechanism)	CC Docket No. 02-6
)	
)	

COMMENTS

BELLSOUTH CORPORATION

Theodore R. Kingsley
Richard M. Sbaratta

Its Attorneys

Suite 4300
675 West Peachtree Street, N. E.
Atlanta, Georgia 30375-0001
(404) 335-0720

Date: March 11, 2004

BellSouth Comments
CC Docket No. 02-6
March 11, 2004

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Schools and Libraries Universal Service)	
Support Mechanism)	CC Docket No. 02-6
)	
)	

COMMENTS

BellSouth Corporation, on behalf of itself and its wholly-owned subsidiaries ("BellSouth"), submits these comments in response to the *Second Further Notice of Proposed Rulemaking* released by the Commission on December 23, 2003.¹

SUMMARY

The Commission's overarching goals with the e-rate program should continue to be (1) the simplification of e-rate program administration; (2) ensuring the equitable distribution (and recovery) of program funds; and (3) the prevention of waste, fraud and abuse within the program. Although the Commission has determined not to resolve in this proceeding the pending petitions for reconsideration of the *Commitment Adjustment Order*, the Commission should at least establish interim policies that make clear that when it seeks recovery of disbursed program funds, the Administrator will look primarily to the applicant, and not the service provider, since it is the applicant who has the most knowledge and responsibility for the

¹ *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, *Third Report and Order and Second Further Notice of Proposed Rulemaking*, FCC 03-323 (rel. Dec. 23, 2003) ("*Third Report and Order*" or "*Second FNPRM*").

application and who actually receives the benefit. In the meantime, the Commission should take immediate action to exempt service providers from fund recovery efforts where (a) the service provider is acting as a Good Samaritan, and (b) in pending COMAD appeals where the applicant, and not the service provider, has erred or violated procedures, policies or rules.

BellSouth believes that lowering the current discount matrix will provide sufficient support for schools and libraries applicants while assuring more accountability and better cost control. BellSouth supports the Commission's proposals with respect to program funding eligibility for network infrastructures. Finally, BellSouth believes that implementing the specific recommendations of the Waste, Fraud and Abuse ("WFA") Task Force is the best way of ensuring that more funding is made available to more applicants under an appropriately streamlined program with adequate protections against waste, fraud and abuse.

I. THE COMMISSION SHOULD CONTINUE TO IMPROVE E-RATE PROGRAM ADMINISTRATION BY ENSURING EQUITABLE DISTRIBUTION AND RECOVERY OF PROGRAM FUNDS

BellSouth commends the Commission for the improvements it has made in the administration of the schools and libraries universal service mechanism (the "e-rate program"). The rules adopted in the *Third Report and Order* should limit the ability of schools and libraries to engage in wasteful or fraudulent practices when obtaining internal connections.² The Commission's overarching goals with the e-rate program should continue to be (1) the simplification of e-rate program administration; (2) ensuring the equitable distribution (and recovery) of program funds; and (3) the prevention of waste, fraud and abuse within the program.

² *Third Report and Order*, ¶¶ 9-30.

The *Second FNPRM* seeks comment on a number of specific proposals that can further these goals. In weighing the public comments on these proposals, the Commission should keep as its overarching goal the equitable distribution and recovery of program funds. Simplification of program administration is important, but there are circumstances where the Universal Service Administrative Company ("USAC") Administrator, acting through its Schools & Libraries Division (the "Administrator") must have the flexibility to consider circumstances on a case-by-case basis. Therefore, a standard rule may not be appropriate in all circumstances, although clear guidelines and expectations from applicants, consultants, vendors and service providers are. Moreover, every rule should be examined in light of the recommendations of the Task Force on the Prevention of Waste, Fraud, and Abuse.³ Waste, fraud and abuse may be facilitated by rules that are unnecessarily simple or vague, as well as those that are exceedingly complex, and will nearly always negatively impact the equitable distribution (and recovery) of program funds.

II. THE COMMISSION'S RULES FOR RECOVERING FUNDS DISBURSED IN VIOLATION OF STATUTORY REQUIREMENTS SHOULD BE TAILORED TO FIT THE CIRCUMSTANCES

The Commission seeks comments on whether it should adopt specific recovery rules for funds that are disbursed in violation of statutory requirements, and on whether it should implement procedures or adopt rules for funds that are disbursed in violation of one or more programmatic rules or procedures under the program or in situations involving waste, fraud or

³ See Recommendations of the Task Force on the Prevention of Waste, Fraud and Abuse, Convened by the Schools and Libraries Division, Universal Service Administrative Company (Sept. 22, 2003) ("WFA Recommendations"), and USAC – Schools & Libraries Support Mechanism Interim Response to the Recommendations of the Task Force on the Prevention of Waste, Fraud, and Abuse (Nov. 2003) ("USAC Interim Response"), submitted by Letter from Cheryl L. Parrino, Chief Executive Officer, Universal Service Administrative Company, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 02-6 (Nov. 26, 2003).

abuse.⁴ BellSouth commends the Commission for seeking comment on the recovery of funds, an area where additional rules and clarity are sorely needed. Although it acknowledges the pending petitions for reconsideration of its *Commitment Adjustment Order*, and specifically the critical point that the Commission should recover erroneously disbursed funds from the party that received the benefit of the disbursement, the Commission states that it seeks to further develop the record in this area rather than resolve those petitions.⁵

BellSouth believes that the Commission should grant the long pending, and prescient, petitions for reconsideration. Especially taking into consideration particular issues that have come to the Commission's attention since those petitions were filed, the Commission should grant those petitions and particularly emphasize the point that equity is just as vital in program administration when funds are being recovered as it is when funds are being disbursed:

If the Commission does seek to collect funds, it should do so from the school or library that actually received the benefit, not the service provider, which neither provides the data contained in a funding application, nor makes any funding decisions based on that data. Further, seeking recovery from applicants rather than service providers would be consistent with Section 254(h)(1)(B) of the Act, which provides that a carrier "shall" receive an offset or reimbursement for discounted services provided to schools and libraries.⁶

The Commission should reverse its fundamental decision to always seek recovery from service providers. In the meantime, the Commission should acknowledge the realities of the program and, in certain circumstances, look primarily to the applicant beneficiary, who has the most knowledge and responsibility for the application.

⁴ *Second FNPRM*, ¶ 81.

⁵ *Id.*

⁶ Petition for Reconsideration of the United States Telecom Association, CC Docket Nos. 97-21 & 96-45, at 7 (filed Nov. 8, 1999) (citations omitted).

Until such time as it may change its current policy, the Commission should adopt specific recovery rules for funds that are disbursed in violation of various statutory requirements as well as for other types of violations or errors that may occur (such as violations of FCC rules, violations of USAC procedures, or when Good Samaritans are involved, to name a few).⁷ While as a general legal principle recovery of funds should be primarily from the applicant, a broader application of this concept would suggest that recovery should come from the party that committed the error or violation. As the Commission has learned from experience, there are clearly facts under which recovery of funds is always more appropriately sought in the first instance from an applicant. By program design, service providers have no control how applications are completed and thus cannot be held responsible for errors or rule violations made by applicants. Service providers should not be made the *de facto*, if not *de jure*, guarantor of schools and libraries funding mechanism applicants. These risks may discourage some service providers from participating in the program, which in turn reduces the competitive pool of service providers.

In particular, service providers acting as Good Samaritans should not be liable to the Administrator for the recovery of program funds. Simply put, the Commission should adopt as a rule the recommendation of the WFA Task Force that a service provider should be exempted from Commitment Adjustment ("COMAD") responsibility when it acts as a Good Samaritan.⁸ As the Task Force states, this rule change will make service providers more willing to step into that role and will reduce the potential for waste when an existing service provider is no longer able to participate in the program. In the last calendar year, BellSouth was requested to, and

⁷ *Second FNPRM*, ¶ 81.

⁸ WFA Recommendations at 12.

ultimately did, act as a Good Samaritan in a situation that involved the cooperative efforts of the applicant, state and federal regulatory authorities, and ultimately a public notice and comment proceeding initiated by the Commission.⁹ BellSouth's involvement, and indeed, the involvement of any other service provider requested by a state or an applicant to act as a Good Samaritan, would have been facilitated by a rule embodying this specific Task Force Recommendation. Such a rule would clearly be equitable, would be simple to administer, and, by the very source of its recommendation, consistent with the prevention of waste, fraud or abuse.

In general, BellSouth believes that the nature of the e-rate program requires more nuanced rules and procedures for handling funds recovery than exist today. For example, a violation of a USAC procedure warrants a different response than a violation of an FCC rule or a statute, and there are some errors that may not warrant recovery action at all. BellSouth agrees that the FCC should not seek to recover *de minimis* amounts (such as under \$500) and should consider establishing a statute of limitations after which no recovery can be sought (perhaps to match the 5-year record retention requirement). We look forward to working with the Commission and the e-rate community to craft clear and equitable recovery rules even as the Commission works to resolve the long-pending petitions for reconsideration.

⁹ See *Request for Immediate Relief filed by the State of Tennessee; Federal-State Joint Board on Universal Service; Changes to the Board of Directors of the National Exchange Carrier Association, Inc.*, CC Docket Nos. 96-45 & 97-21, *Order*, 18 FCC Rcd 13581 (2003); *BellSouth Corporation Petition for Clarification of Request for Immediate Relief filed by the State of Tennessee; Federal-State Joint Board on Universal Service; Changes to the Board of Directors of the National Exchange Carrier Association, Inc.*, CC Docket Nos. 96-45 & 97-21, *Order*, 18 FCC Rcd 24688 (2003).

III. LOWERING THE DISCOUNT MATRIX IS CONSISTENT WITH THE COMMISSION'S PROGRAM IMPROVEMENT GOALS

The WFA Task Force has recommended a reconfiguration of the current discount matrix.¹⁰ BellSouth supports adjusting the discount matrix so that the highest discount level is below the current 90% available on all eligible services.¹¹ A 90% discount provides insufficient incentives for applicants to control project costs and too much incentive for vendor service providers to inflate costs. A lower discount would provide sufficient support for schools and libraries while at the same time restoring a modicum of market discipline, through more accountability and better cost control, which will combat current distortions. BellSouth believes that the highest discount available should be as low as 75%, but acknowledges that there are a number of proposals on the table that would help to address the concerns raised by the 90% discount. For example, the WFA Task Force proposes a top discount of 80% on all services, while SECA suggests reducing only the discounts for Priority 2 services. Either of these proposals would help to change the incentives in the program in a positive way. In addition, lowering the discount percentages will help ensure that the fund will be available for more schools and for more services.¹²

¹⁰ WFA Recommendations at 3-4.

¹¹ Statement of Margaret Greene, President, Regulatory & External Affairs, BellSouth Corporation, before the FCC's Forum on the E-rate Program, May 8, 2003, at 10-11, submitted with letter from Mary L. Henze, Assistant Vice President, Federal Regulatory, BellSouth Corporation, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 02-6 (May 9, 2003) ("Greene Statement").

¹² *Id.*

IV. THE COMMISSION'S PROPOSED WAN RULES SHOULD ENSURE MORE EQUITABLE DISTRIBUTION OF FUNDS

BellSouth believes that the Commission should continue to refine its policies in such a way as to discourage the construction of private networks or the use of e-rate funds to subsidize construction of unnecessary new facilities that may be used to serve non-e-rate customers.

While increased vigilance in the application review process is critical, BellSouth agrees that a limit on the amount of funding for discounts on service provider upfront capital investments would also be helpful. The Commission has proposed that such a limitation would take effect once those capital investments exceed 25% of the funding request for the service in question. This appears to be a reasonable starting point, which could be adjusted as the Administrator gathers data from future funding requests.

BellSouth supports the Commission's proposed rule that would establish that e-rate discounts for any service provider charges for capital investment of \$500,000 or more must be prorated over a period of at least five years.¹³ BellSouth agrees with the Commission that such a rule could serve to spread funding for Priority One services more evenly across funding years.¹⁴ Finally, and similarly, the Commission should not permit e-rate funding for dark fiber under the schools and libraries support mechanism. To the extent that the Commission does permit such funding, limitations should be adopted to preclude discounts on the full cost of dark fiber network build-out when the applicant will not be utilizing the full capacity of that network.¹⁵

¹³ *Second FNPRM*, ¶ 75.

¹⁴ *Id.*

¹⁵ BellSouth's position on dark fiber is articulated in the *ex parte* filed with the Commission on February 27, 2004; see letter from Mary L. Henze, Assistant Vice President, Federal

V. THE COMMISSION SHOULD ADOPT THE PROPOSALS OF THE WFA TASK FORCE AND TAKE SPECIFIC ACTIONS TO REDUCE WASTE, FRAUD AND ABUSE

The WFA Task Force has made a number of critical recommendations, and the Commission has made several proposals, that BellSouth supports in connection with the competitive bidding process in particular and the e-rate program generally. These recommendations include:

- Modification of Form 470 to require the applicant to list all products and services needed, regardless of the existence of a request for proposal (“RFP”).
- Where procurement or contract problems in a Form 470 posting are identifiable with a specific funding request or a specific vendor, the SLD should not automatically deny all unrelated funding requests on that same Form 470 posting.
- Processes should be established that would better align the application process with proposals contained in individual applications, including the establishment of a “simple” Form 470 and 471 for less complex applicant proposals.
- *Recordkeeping Requirements.* The Commission should amend its rules to provide that all records related to the receipt or delivery of discounted services that demonstrate compliance with the FCC's rules be maintained both by applicants and service providers for a period of 5 years. The Commission should clarify, however, that service providers are responsible only for records

Regulatory, BellSouth Corporation, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 02-6 (Feb. 27, 2004).

regarding applicants to whom they actually provide service, and not records for applicants on whose contracts they may have bid, but not won.

- *Consultants and Outside Experts.* Consultants and other outside experts offering their services to applicants should be required to register with USAC and to disclose any potential conflicts of interests derived from relationships with service providers. BellSouth supports the recommendations of the WFA Task Force related to the appropriate role of consultants and outside experts, and in particular the recommendation that the SLD assign an entity code to consultants similar to that of applicants and service providers and to follow “IRS tax preparer” signature policies for consultants or other non-applicants who prepare forms for applicants. Applicants should be required to identify any such consultants or outside experts, whether paid or unpaid, that assist in any connection with the applicant’s technology plan or in the applicant’s procurement or application process.
- *Technology Plans.* The Commission should revise its rules regarding technology plans in order to ensure that applicants are ready to fully utilize supported products and services. At the very minimum the Commission’s rules should provide that technology plans be completed and approved before products and services are purchased and installed. BellSouth believes that the Commission’s technology planning requirements should be amended to be made more consistent with the technology planning goals and requirements of

the U.S. Department of Education and the U.S. Institute for Museum and Library Services.¹⁶

- *Prevention of Unauthorized Applications by Subunits.* BellSouth believes that it is reasonable for the FCC to require that an applicant certify that it has the appropriate authorization from its central authority to file the application. BellSouth also believes that false certification should be a factor to consider when, in an enforcement action, the Commission decides whether to seek recovery of the disbursed funds and from whom. A service provider should be able to rely on such certification and be presumed not to be liable to the SLD for repayment of disbursed funds unless it can be demonstrated that the service provider had knowledge that the certification was false.

All of these recommendations and proposals should be given substantial weight by the Commission, in addition to the comments received in response to the *Second FNPRM*. Implementing the recommendations of the WFA Task Force will go a long way to making an outstanding program even better.

CONCLUSION

While the Commission considers the pending petitions for reconsideration of the *Commitment Adjustment Order*, the Commission should at least exempt service providers from fund recovery efforts where the service provider is acting as a Good Samaritan or where the applicant, and not the service provider, has erred or violated procedures, policies or rules. BellSouth believes that a combination of lowering the current discount matrix and implementing

¹⁶ *Second FNPRM*, ¶ 94.

the recommendations of the WFA Task Force is the best way of ensuring that more funding is made available to more applicants.

Respectfully submitted,

BELLSOUTH CORPORATION

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Date: March 11, 2004

CERTIFICATE OF SERVICE

I do hereby certify that I have this 11th day of March 2004 served the following parties to this action with a copy of the foregoing **COMMENTS** by electronic filing, addressed to the parties below.

Marlene H. Dortch
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/s/ Juanita H. Lee
Juanita H. Lee

CERTIFICATE OF SERVICE

I do hereby certify that I have this 10th day of May 2004 served a copy of the foregoing

REQUEST FOR REVIEW via electronic and overnight mail to the following:

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Schools & Libraries Division
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Lynn Barclay